

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY
Albert Russo PO Box 4853 Trenton, NJ 08650 (609) 587-6888 Standing Chapter 13 Trustee
In re: Dariusz Dziecnyk Debtor(s)

Case No. 21-14420 / MBK

Hearing Date: September 8, 2021 10:00 am

Judge: Michael B. Kaplan

Chapter: 13

TRUSTEE'S OBJECTION TO DEBTOR(S) CHAPTER 13 PLAN

Albert Russo, Standing Chapter 13 Trustee, objects to the Debtor(s) Plan for the following reason(s):

The debtor has failed to supply the Trustee with the following document (s):

A current market analysis - for 4 Main Street, Suite 1, Helmetta, NJ and 42 -44 Main Street, South River, NJ

The debtor has failed to supply proof of Social Security Number to the Trustee.

- Need documentation showing cash value of wife's whole life policy.
- Transfer of vacant lot in the Poconos on 5/7/2021. Sale price was \$57,500 and net proceeds to debtor and spouse in the amount of \$52,452.08 - need closing information on this transaction
- Trustee to receive any non exempt proceeds from the sale of 8 Wilson Way and 10 Wilson Way.
- The confirming order on the 100% plan should preserve a threshold of \$1,107,000.

WHEREFORE, Standing Chapter 13 Trustee, Albert Russo, objects to confirmation of the plan.

/s/ Albert Russo

Albert Russo

Standing Chapter 13 Trustee

by: David Martin, Staff Attorney